

December 22, 2011

Corey Vodvarka
Plant Manager
Exide Technologies
2700 South Indiana Street
Vernon, CA 90058

Reference: Application No. 530090

Approval of the Rule 1420.1 Compliance Plan for Facility ID # 124838

Dear Mr. Vodvarka:

The South Coast Air Quality Management District (AQMD) has received your Application No. 530090, submitted on December 16, 2011, for a Rule 1420.1 (Emission Standards for Lead-Acid Battery Recycling Facilities) Compliance Plan, for your facility located at 2700 South Indiana Street, Vernon, California 90058. The Rule 1420.1 Compliance Plan application is required by Rule 1420.1(g), due to exceedances of ambient air lead concentrations of $0.12 \mu\text{g}/\text{m}^3$ averaged over 30 consecutive days on or beyond July 1, 2011 at one or more ambient monitors around the Exide facility. AQMD staff has evaluated and approved your Rule 1420.1 Compliance Plan subject to the following conditions:

1. Exide shall implement all lead emission measures submitted with the Revised Rule 1420.1 Compliance Plan under Application No. 530090, unless otherwise specified below.
2. Exide shall install a minimum of six (6) boot wash stations at the exits of the total containment buildings at this facility. The installation of the boot wash stations shall be completed not later than June 30, 2012. Written notification shall be provided to the AQMD when installation is complete.
3. Exide shall designate one or more forklifts to be exclusively used inside of the total containment buildings so that the probability of tracking lead bearing materials outside of the containment buildings is lowered when heavy moving equipment is operated at this facility. The first forklift dedicated to indoor use only shall be implemented not later than June 30, 2012. Written notification shall be provided to the AQMD when the new forklift(s) are operational.

4. On and after January 1, 2012, beginning with the 30-day period of January 1, 2012 through January 30, 2012, if monitored ambient lead concentrations exceed $0.15 \mu\text{g}/\text{m}^3$, but no more than $0.30 \mu\text{g}/\text{m}^3$, on a rolling 30 day average at any AQMD or AQMD-approved ambient monitor. Exide shall implement the following mandatory daily process curtailments:
 - A. Reduce the amount charged to the reverberatory furnace by 25% of the daily average charged over the prior 90 days;
 - B. The mandatory curtailments contained within this condition shall begin within 48 hours of the time when Exide receives the sampling results (and in the case of an AQMD monitor, the quality assurance and O&M data for the monitor). Exide shall calculate the above-referenced averages based on the total materials charged in the relevant time period above divided by the number of days when there were materials charged and shall provide supporting documentation to the District to justify the calculated averages prior to the required time of implementation. These mandatory curtailments shall remain in effect until the monitoring results at the affected monitoring station reflect 15 consecutive 30-calendar day averages of less than $0.15 \mu\text{g}/\text{m}^3$.
5. On and after January 1, 2012, beginning with the 30-day period of January 1, 2012 through January 30, 2012, if monitored ambient lead concentrations exceed $0.30 \mu\text{g}/\text{m}^3$ on a rolling 30 day average at any AQMD or AQMD-approved ambient monitor, Exide shall implement the following mandatory daily process curtailments:
 - A. Reduce the amount charged to the reverberatory furnace by 50% of the daily average charged over the prior 90 days;
 - B. The mandatory curtailments contained within this condition shall begin within 48 hours of the time when Exide receives the sampling results (and in the case of an AQMD monitor, the quality assurance and O&M data for the monitor). Exide shall calculate the above-referenced averages based on the total materials charged in the relevant time period above divided by the number of days when there were materials charged and shall provide supporting documentation to the District to justify the calculated averages prior to the required time of implementation. These mandatory curtailments shall remain in effect until the monitoring results at the affected monitoring station reflect 30 consecutive 30-calendar day averages of less than $0.15 \mu\text{g}/\text{m}^3$ or the monitoring results at the affected monitoring station reflect ten consecutive days below $0.12 \mu\text{g}/\text{m}^3$ and no other monitor causes a violation of Rule 1420.1.
6. Exide shall complete construction of the baghouse area Total Containment Building no later than March 31, 2012. Exide shall notify the Executive Officer of the AQMD in writing within 48 hours of completion of the construction.

7. On or after completion of construction of the baghouse area Total Containment Building, but no later than March 31, 2012, if monitored ambient lead concentrations exceed $0.15 \mu\text{g}/\text{m}^3$ on a rolling 30 day average at any AQMD or AQMD-approved ambient monitor, Exide shall commence implementing the specific lead emission mitigation measures listed below in this condition. Each of these mitigation measures may be implemented individually or in any combination based on the specific situation and information available at the time. Within 15 days of each occurrence, Exide shall submit to the AQMD for approval the selected measure(s) to be implemented along with a description of the specific situation and available information that justifies the specific selection. An implementation timeline shall also be included and shall be established based on Exide's best effort for implementation. The selected measure(s) shall be implemented as approved by the AQMD. These specific individual mitigation measures are as follows:
- A. Install an additional room ventilation baghouse or dust collector, equipped with a second stage high efficiency particulate air (HEPA) filter, with sufficient blower capacity to move a minimum of 50,000 CFM of air from one or more of the following locations:
- a. The battery crusher room in the North end of the RMPS building.
 - b. The truck loading and unloading dock on the South end of the RMPS building.
 - c. The furnace room in the smelter building.
 - d. The cupola feed room in the south end of the smelter building.
- As an alternative to adding additional ventilation with individual baghouses or dust collectors, Exide may install a single larger air pollution control system with at least 200,000 CFM of blower capacity to cover all four of these locations.
- B. Install second stage HEPA filters on one or more of the following air pollution control systems:
- a. The hard lead refinery baghouse (device C47).
 - b. The soft lead refinery baghouse (device C46).
 - c. The MAC baghouses venting the RMPS building (devices C156, C157).
 - d. The cupola furnace feed room baghouse (device C48).
- C. All new HEPA filter installations performed pursuant to parts A and B of this condition shall comply with the following requirements:
- a. The HEPA filters used in this equipment shall be certified, in writing, by the manufacturer to have a minimum control efficiency of 99.97 percent on 0.3 micron particles.

- b. Copies of the HEPA filter certifications shall be kept and maintained on file for a minimum of 5 years and shall be provided to District personnel upon request.
8. Prior to implementing parts A and B of condition no. 7, Exide shall first submit the required permit applications, additional information and associated fees to the AQMD and obtain the required written Permits to Construct required prior to commencement of construction.
9. For the purpose of compliance with the incremental mitigation measures in condition no. 7, when one requirement is triggered by a violation of the $0.15 \mu\text{g}/\text{m}^3$ rolling 30 day average lead concentration limit, a second and subsequent mitigation measure may not be required for additional violations of the $0.15 \mu\text{g}/\text{m}^3$ rolling 30 day average lead concentration limit, until after the ongoing mitigation measure has been implemented. Exide shall notify the AQMD in writing within 48 hours of completion of each mitigation measure in condition no. 7.

It is Exide's responsibility to comply with all other applicable Rule 1420.1 requirements, all other applicable AQMD Rules and Regulations and with all laws, ordinances, and regulations of other governmental agencies which are applicable to the operation of the facility.

This plan shall be incorporated into the written Standard Operating Plan (SOP) required by 40 CFR 63 Subpart X. Please ensure that a copy of this letter is kept on site with your Title V Permit to facilitate compliance determination. Should you have any questions regarding this plan approval, please contact Mr. Marco Polo at (909) 396-2633.

Very truly yours,

Jay Chen, P.E.
Senior Engineering Manager
Engineering and Compliance

JC/CT/TGL/MAP

Cc: Mohsen Nazemi
Jill Whynot
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Application File

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